



U.S. Department of Justice

United States Attorney
Southern District of New York

50 Main Street, Suite 1100
White Plains, New York 10606

April 6, 2023

VIA ECF

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Ian Mitchell, 23 Cr. 147 (CS)*

Dear Judge Seibel:

On March 24, 2023, the defendant was arraigned on the above-referenced indictment before Judge McCarthy and detained on consent. Judge McCarthy also excluded time under the Speedy Trial Act between March 24, 2023, and April 7, 2023. The initial status conference before Your Honor is presently scheduled for April 11, 2023. The Government respectfully requests, with the consent of defense counsel, that time be excluded under the Speedy Trial Act between April 7, 2023, and April 11, 2023. Such an exclusion would serve the interests of justice and outweigh the best interests of the defendant and the public in a speedy trial because it would allow the parties to produce and review discovery and to begin discussions about a potential pretrial disposition.

The Government also respectfully writes to inform the Court that the parties have reached an agreement regarding a protective order to govern discovery disclosures. The proposed protective order is attached to this letter. Accordingly, the Government respectfully requests, with the consent of defense counsel, that the proposed protective order be entered.

The time between now and 4/11/23 is hereby excluded under the Speedy Trial Act in the interests of justice. The ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will enable Defendant and his counsel to produce and review discovery, and because it will permit discussion of a potential disposition without trial. SO ORDERED.

4/6/23

CATHY SEIBEL, U.S.D.J.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Qais Ghafary
Qais Ghafary
Assistant United States Attorney
Tel: (914) 993-1930

Cc: Elizabeth Quinn, Esq. (via ECF)